UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Criminal No. 21cr10255
v.) Violation:
(1) DEIVY ROBINSON PARADIS TORRES and	 Count One: Conspiracy to Distribute and to Possess with Intent to Distribute 400 Grams or More of Fentanyl
(2) ROBINSON PARADIS FELIZ,) (21 U.S.C. § 846)
Defendants) Forfeiture Allegation:) (21 U.S.C. § 853)

INDICTMENT

COUNT ONE

Conspiracy to Distribute and to Possess with Intent to Distribute 400 Grams or More of Fentanyl (21 U.S.C. § 846)

The Grand Jury charges:

From in or about September 2020 through at least April 2021, in Boston and Braintree, in the District of Massachusetts and elsewhere, the defendants,

(1) DEIVY ROBINSON PARADIS TORRES and (2) ROBINSON PARADIS FELIZ,

conspired with each other and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the offense charged in Count One involved 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-

piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vi) is applicable to this Count. It is further alleged that, with respect to Count One, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance, were reasonably foreseeable by, and are attributable to, (1) DEIVY ROBINSON PARADIS TORRES and (2) ROBINSON PARADIS FELIZ. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vi) is applicable to defendants (1) DEIVY ROBINSON PARADIS TORRES and (2) ROBINSON PARADIS FELIZ.

All in violation of Title 21, United States Code, Section 846.

<u>DRUG FORFEITURE ALLEGATION</u> (21 U.S.C. § 853)

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count One, the defendants,

(1) DEIVY ROBINSON PARADIS TORRES and (2) ROBINSON PARADIS FELIZ,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense. The property to be forfeited includes, but is not limited to, the following assets:

- a. \$17,256 in United States currency, seized on April 26, 2021, from 800 West Street, Apartment #2304, Braintree, Massachusetts; and
- b. \$4,340 in United States currency, seized on April 30, 2021, during the arrest of (2) ROBINSON PARADIS FELIZ in Plainville, Massachusetts.
- 2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants -
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

CRAIG E. ESTES

ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS

District of Massachusetts: AUGUST 26, 2021

Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 1:15pm

DEPUTY CLERK